

IN THE U.S. BANKRUPTCY COURT

NORTHERN DISTRICT OF OHIO

In Re: Grant Thomas Wilcox

Bankruptcy Case: 20-51998-amk

Grant T. Wilcox,
9858 Green Dr
Windham, OH 44288

Adv. Pro. No. 21-5001

Debtor/Plaintiff

Honorable Alan M. Koschik

Sara N. Wilcox

PLAINTIFFS NOTICE OF
DEFENDANTS MATERIAL
MISREPRESENTATION

9268 Mulberry Road SE
Mount Perry, OH 43760

Creditor/Defendant
Vs.

Herbert Baker
301 Main Street

Zanesville, OH 43701

Zanesville, OH 43701

Creditor/Defendant

Now comes the Debtor/Plaintiff, Pro Se and hereby gives notice that

the Defendants have made another misrepresentation the Court. On

February 3rd, 2021 this Court conducted a hearing on Plaintiff/Debtors

motion for a restraining order against the Creditor/Defendant's. During

this hearing Defendant's Counsel stated that Defendants were filing a

1 motion the withdrawal the bench warrant out of the Domestic Relations
2 Court. Counsel also stated that the non-oral hearing was set for February
3 8th, 2021 and the Court agreed to hold another hearing on February 10th,
4 2021 regarding the need for a Temporary Restraining Order.
5

6 On February 4th, 2021 the Defendant's filed their motion to
7 withdrawal the capias with the Domestic Relations Court (Exhibit A).
8 However instead of the non-oral hearing being schedule on February 8th,
9 2021 as the Defendant's represented to this Court. It is instead scheduled
10 on February 18th, 2021 ten days after the date the Defendants represented
11 to this Court.
12

13 Once again the Defendants continuous nonstop misrepresentations
14 and contortions of fact to this Court continue to cause undue burden,
15 stress, anxiety and separation from the Plaintiff's Child (Debtor is aware
16 this Court can do nothing about custody issues). The Plaintiff requested
17 that the Creditors file their motion to withdrawal the capias numerous
18 times. Plaintiff even delayed filing his this motion for a TRO because he
19 was led to believe that such motion was forth coming about a month ago.
20

21 The Defendant's didn't take action with the Domestic Relations Court
22 until after the Plaintiff filed his motion for a TRO.
23

Respectfully Submitted,

/s/ Grant T. Wilcox
Grant T. Wilcox
Debtor, Pro Se
9858 Green Drive
Windham, OH 44288
330-990-5416
grant.wilcox@gmail.com

CERTIFICATE OF SERVICE

I Grant T. Wilcox certifies that a copy of the foregoing **Debtors/ Plaintiff's reply in support for motion for protection order** was served via electronic mail upon Anthony J. DeGirolamo, Counsel for Defendants on February 5th, 2021.

/s/ Grant T. Wilcox
Grant T. Wilcox

Repper DV

CLERK COMMON
PLEAS COURT
LICKING CO. OHIO

2021 FEB -4 AM 8:54

OLIVIA C. PARKINSON
CLERK

IN THE COURT OF COMMON PLEAS, LICKING COUNTY, OHIO
DOMESTIC RELATIONS DIVISION

SARA N. WILCOX (BUTTS) :
9268 Mulberry Road :
Mt. Perry, OH 43760 :
Plaintiff :
v. : Case No. 15 DR0574
GRANT T. WILCOX, et al. : JUDGE FROST
9858 Green Drive :
Windham, Ohio 44288 :
Defendants : **MOTION**

Now comes the Plaintiff herein, Sara N. Wilcox (Butts), through counsel, and moves the Court for the withdrawal of the Capias entered by this Court on November 2, 2020.

Plaintiff's grounds are set forth below.

MEMORANDUM

Plaintiff is requesting that the Court withdraw the Capias issued by this Court on November 2, 2020 to the extent that the same was issued for the Defendant's failure to comply with the terms of the parties' Decree in Divorce.

Respectfully submitted,

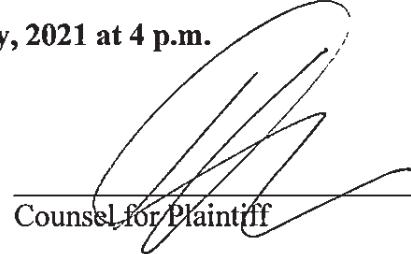
HERBERT W. BAKER - #0015352
Attorney for Plaintiff

301 Main Street, P.O. Box 400
Zanesville, OH 43702-0400
Telephone: (740) 452-8426
Fax: (740) 452-4085

HERBERT W. BAKER
ATTORNEY AT LAW
301 MAIN STREET
P.O. Box 400
ZANESVILLE, OH
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(740) 452-4085

NOTICE OF HEARING

The foregoing Motion shall come on for hearing before the Honorable Duke Frost, Judge of the Licking County Common Pleas Court, Domestic Relations Division by a NON-ORAL hearing on the **18th day of February, 2021 at 4 p.m.**

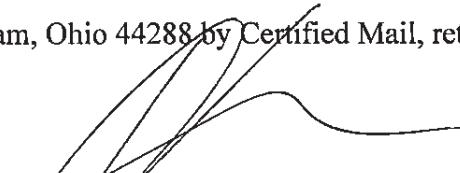


Counsel for Plaintiff

REQUEST FOR SERVICE

TO THE CLERK:

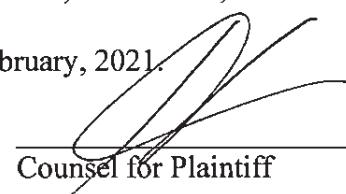
Please issue service and a copy of the foregoing Motion and serve the Defendant, Grant T. Wilcox at 9858 Green Dr., Windham, Ohio 44288 by Certified Mail, return receipt requested.



Counsel for Plaintiff

CERTIFICATE OF SERVICE

I hereby certify that a copy of the foregoing Motion was served upon Defendants, Thomas and Kim Wilcox at 641 State Route 303, Streetsboro, OH 44241 by regular U.S. Mail, postage prepaid, this 30 day of February, 2021.



Counsel for Plaintiff

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